

REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-50 in the application. In this preliminary amendment, the Applicants have amended Claims 1-4, 11-14, 21-24, 31-34, 41-44 and 46. The Applicants have not canceled or added any claims. Accordingly, Claims 1-50 are currently pending in the application.

I. Rejection of Claims 1-18 under 35 U.S.C. §103

The Examiner had rejected Claims 1-18 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,732,286 to Leger in view of U.S. Patent No. 3,586,771 to Hamburger, *et al.* The Applicants respectfully disagree since the cited combination does not teach or suggest facilitating communications between a master device and a slave device of a packet transport system associated with a switching network and having a master device and a slave device that transmits packets therebetween over a local interface as recited in amended independent Claims 1 and 10. The Examiner recognizes that Leger does not teach or suggest issuing an event driven message to a master device. To cure this deficiency, the Examiner cites Hamburger. (*See Examiner's Final Action*, page 2.) Hamburger, however, also does not teach or suggest issuing an event driven message to a master device as recited in independent Claims 1 and 10. More specifically, Hamburger does not teach or suggest issuing an event driven message over a local interface to a master device that transmits and receives packets over the local interface to and from a slave device that provides a network interface to a switching network for the master device as recited in amended Claims 1 and 10.

Hamburger discloses no such master and slave devices. Hamburger is directed to

subscription television or radio signal distribution systems and, more specifically, determining at regularly repeated intervals the number of active subscribers at a time and then transmitting this number to a common recording point. (See column 1, lines 1-20.) Hamburger teaches a substation (a slave) which facilitates the production of required information signals representing the number of subscribers and the transmission of the signals to the common recording point (master station). (See column 1, lines 37-41.) Hamburger teaches the substation reports the required information signals to the common recording point in response to a command signal therefrom. (See column 1, lines 41-64.)

Thus, Hamburger teaches a television or radio signal distribution system having a common recording point and substations wherein the substations send information signals to the common recording point. The Applicants do not find any teaching or suggestion in Hamburger of a master device and a slave device as recited in amended Claims 1 and 10. Hamburger does not teach or suggest a master device and a slave device of a packet transport system wherein the master device and the slave device transmit packets therebetween over a local interface and the slave device provides a network interface to a switching network for the master device. More specifically, Hamburger does not teach or suggest such a master and slave device of a packet transport system wherein an event driven message is issued to the master device over the local interface. Hamburger, therefore, does not teach or suggest each element of amended Claims 1 and 10.

Even though the Examiner recognizes that Leger does not teach issuing an event driven message to a master device, the Examiner asserts that Leger does teach issuing an event driven message to a transmitting device but does not use the terms "master" and "slave." (See Examiner's Final Action, page 7.) As discussed above, however, a master and slave device as presently recited

in Claims 1 and 10 is more than just a transmitting and receiving device as taught by Leger. For example, Leger teaches a computer system utilizing a peripheral hardware controller that provides an interface between a system bus and external I/O devices. (See column 4, lines 44-60.) The peripheral hardware controller includes a FIFO buffer and a FIFO controller that signals external devices to stop or resume transfer of data based on the number of data packets in the FIFO buffer. (See column 7, lines 24-33.)

Leger provides no teaching or suggestion of a master device and a slave device of a packet transport system that transmits packets therebetween over a local interface wherein the slave device provides a network interface to a switching network for the master device as recited in amended Claims 1 and 10. More specifically, Leger does not teach or suggest such a master and slave device of a packet transport system wherein an event driven message is issued to the master device over the local interface as claimed in amended Claims 1 and 10. Instead, Leger discloses a FIFO controller that communicates with external devices when a receiving buffer has reached a limit. The external devices are not master devices as presently claimed. Additionally, the receiving buffer is not a slave device of the external devices. For example, the receiving buffer does not provide a network interface to a switching network for the external devices. Thus, not only does Leger not use the terms master device and slave device, Leger provides no teaching or suggestion of a packet transport system having a master and slave device as in amended Claims 1 and 10. Accordingly, one skilled in the art would not arrive at the present invention if the teachings of Leger were combined with those of Hamburger.

Therefore, the cited combination of Leger and Hamburger fails to teach or suggest the invention recited in amended independent Claims 1 and 10 and Claims dependent thereon.

Accordingly, the Applicants respectfully request the Examiner withdraw the 35 U.S.C. §103(a) rejection of Claims 1-18 and allow issuance thereof.

Furthermore, one skilled in the art would not be motivated to combine the teachings of Leger with those of Hamburger. Leger is directed to peripheral hardware controllers in computer systems, and, more particularly, to a controller that uses a first-in, first-out (FIFO) buffer to control data transfer across a CPU bus to and from peripheral devices. (See column 1, lines 6-10.) Hamburger, on the other hand, is directed to determining the number of active subscribers of subscription television or radio signal distribution systems employing a common recording point and substations. (See column 1, lines 1-20.) The Applicants do not find any teaching in Hamburger directed to controlling data transfer across a CPU bus and peripheral devices as addressed by Leger.

II. Rejection of Claims 19-22, 24-29, 31-38, 40-48 and 50 under 35 U.S.C. §103

The Examiner has rejected Claims 19-22, 24-29, 31-38, 40-48 and 50 under 35 U.S.C. §103(a) as being unpatentable over Leger in view of Hamburger and in further view of U.S. Patent No. 6,601,105 to Bell, Jr., *et al.* (Bell). The Applicants respectfully disagree.

As discussed above, the cited combination of Leger and Hamburger does not teach or suggest a master device and a slave device of a packet transport system that transmits packets therebetween over a local interface wherein the slave device provides a network interface to a switching network for the master device as recited in amended Claims 1 and 10. More specifically, the cited combination does not teach or suggest such a master and slave device of a packet transport system wherein an event driven message is issued to the master device over a local interface as claimed in amended Claims 1 and 10. Independent Claims 19, 26, 33 and 41 also

include a master and slave device of a packet transport system wherein an event driven message is issued to the master device over a local interface as claimed in amended Claims 1 and 10. Thus, the cited combination of Leger and Hamburger does not teach or suggest each and every element of independent Claims 19, 26, 33 and 41.

Bell has not been cited to cure the deficiencies of the cited combination of Leger and Hamburger but to teach an additional limitation of independent Claims 19, 26, 33 and 41. More specifically, Bell has been cited to teach an aggregate level detector. (See Examiner's Final Action, pages 4-5). Bell, however, also does not teach or suggest a master and slave device of a packet transport system wherein an event driven message is issued to the master device over a local interface as claimed in amended independent Claims 19, 26, 33 and 41. On the contrary, Bell teaches sending a grant/hold signal to a producer 12 indicating a number of packets that may be sent to a buffer 14 subject to a latency Y. (See column 3, lines 34-39 and Figure 1.) Thus, the cited combination of Leger, Hamburger and Bell does not teach or suggest each and every element of independent Claims 19, 26, 33 and 41.

Therefore, the cited combination of Leger, Hamburger and Bell fails to teach or suggest the invention recited in independent Claims 19, 26, 33 and 41 and Claims dependent thereon. Accordingly, the Applicants respectfully request the Examiner withdraw the 35 U.S.C. §103(a) rejection of Claims 19-22, 24-29, 31-38, 40-48 and 50 and allow issuance thereof.

III. Rejection of Claims 23, 30, 39 and 49 under 35 U.S.C. §103

The Examiner has rejected Claims 23, 30, 39 and 49 under 35 U.S.C. §103(a) as being unpatentable over Leger in view of Hamburger and Bell and further in view of U.S. Patent No.

6,366,959 to Sidhu, *et al.* (Sidhu). The Applicants respectfully disagree.

As discussed above, the cited combination of Leger, Hamburger and Bell does not teach or suggest each and every element of independent Claims 19, 26, 33 and 41. Sidhu is directed to choosing buffer size and error correction coding for real time communication over packet networks. (Column 1, lines 28-32). Sidhu has not been cited to cure the deficiencies of the cited combination of Leger, Hamburger and Bell, but to teach feedback in a single packet. (Examiner's Final Action, page 6). Accordingly, the cited combination of Leger, Hamburger, Bell and Sidhu does not teach or suggest each and every element of independent Claims 19, 26, 33 and 41 and Claims that depend thereon. Accordingly, the Applicants respectfully request the Examiner withdraw the 35 U.S.C. §103(a) rejection of Claims 23, 30, 39 and 49 and allow issuance thereof.

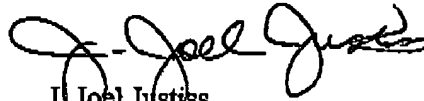
IV. Conclusion

In view of the foregoing remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-50.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application.

Respectfully submitted,

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